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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 3, 2016

16-NWP-039

Mr. Kevin Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Ms. Peggy McCullough, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Approval of 24590-WTP-PCN-ENV-12-006, Class 11 Modification to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit)*
WA7890008967

Reference: See page 2

Dear Mr. Smith and Ms. McCullough:

The Department of Ecology approves the referenced Class 11 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated Closure Plan for WTP. This is listed on the enclosure and replaces the corresponding permit Closure Plan in Chapter 11 of the WTP Permit.

The approved Closure Plan updates information required for *Appendix 1.0, WTP Interim Compliance Schedule*, Permit Condition III.10.C.8, item 8. Since the Closure Plan will continue to be updated, the Compliance Schedule item 8 will not be closed.

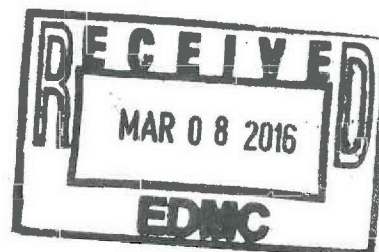
If there are any questions, please contact Stacy Nichols, WTP Permit Writer, at stacy.nichols@ecy.wa.gov or (509) 372-7917.

Sincerely,

Suzanne Dahl
Tank Waste Disposal Section Manager
Nuclear Waste Program

sn/jt
Enclosure

cc: See page 2



Mr. Smith and Ms. McCullough
March 3, 2016
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Reference: Letter 15-ECD-0048, received November 13, 2015, from R.G. Hastings, USDOE-ORP, to J.A. Hedges, Ecology, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-WTP-PCN-ENV-12-006"

cc electronic w/enc:

Dave Bartus, EPA
Dennis Faulk, EPA
Jan Bovier, USDOE
Mary Beth Burandt, USDOE
Cliff Clark, USDOE
Joanne Grindstaff, USDOE
Bill Hamel, USDOE
Robert Hastings, USDOE
Lori Huffman, USDOE
Ed MacAlister, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Bryan Trimberger, USDOE
Barry Curn, BNI
Brad Erlandson, BNI
Serena Greagor, BNI
Roger Landon, BNI
John Lesser, BNI
Sandi Murdock, BNI

Jon Perry, MSA
Ken Niles, ODOE
Gail Laws, WDOH
Deborah Alexander, Ecology
Robbie Biyani, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Nitya Chandran, Ecology
Suzanne Dahl, Ecology
Tracy Gao, Ecology
Mandy Jones, Ecology
Dan McDonald, Ecology
Stacy Nichols, Ecology
John Richardson, Ecology
Oliver Wang, Ecology
BNI Correspondence Control
USDOE-ORP Correspondence Control
Environmental Portal
Hanford Facility Operating Record

cc w/enc:

Russell Jim, YN
Steve Hudson, HAB
Administrative Record: Waste Treatment Plant (TSD #H-0-8)
NWP Central File

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
NWP Reader File



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Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit 10
Waste Treatment and Immobilization Plant

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Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Replace existing WTP Dangerous Waste Permit Chapter 11 Closure Plan with updated Closure Plan per
Permit Condition III.10.C.8 and Appendix 1.0 WTP Interim Compliance Schedule item 8.

Submitted by Co-Operator:

Roger J. Landon 9/10/15
Roger J. Landon Date

Reviewed by ORP Program Office:

Jeanne Sulistyo 10/26/15
~~D. L. Noyes~~ ~~J.F. Grinstead~~ Date

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24590-WTP-PCN-ENV-12-006

Hanford Facility RCRA Permit Modification Notification Form

Unit: Waste Treatment and Immobilization Plant	Permit Part: Part III, Operating Unit 10
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Description of Modification:

The purpose of this Class 11 modification is to update the Closure Plan for the WTP in Chapter 11 of the DWP and incorporate into the RCRA Sitewide Permit as Addendum H.

Chapter 11			
Replace:	WTP Dangerous Waste Permit, Chapter 11 Closure Plan	With:	WTP Dangerous Waste Permit, Addendum H Closure Plan

This modification requests Ecology approval and incorporation into the permit the specific changes to the above DWP documents.

The revision to the current Chapter 11 Closure Plan, which will be incorporated into the RCRA Sitewide Permit, is the result of compliance with the Appendix 1.0 WTP Interim Compliance Schedule, Permit Condition III.10.C.8, Compliance Schedule Item 8 (Update and resubmit the Closure Plan for approval).

A summary of updates to the WTP DWP Closure Plan are as follows:

- Inclusion of the AEA statement regarding the regulation of radiation hazards
- Clarification of references to radiation requirements
- Revision to the Closure Schedule
- Revisions for consistency based on the following documents:
 - a. *Guidance for Clean Closure of Dangerous Waste Units and Facilities* (Ecology, 2005)
 - b. *Guidance on Sampling and Data Analysis Methods* (Ecology, 1995)
 - c. *Training Module Introduction to Closure/Post-Closure* (40 CFR Parts 264/265, Subpart G) (EPA, 2003)
 - d. *Model Toxics Control Act Regulation and Statute* (Ecology 2013)
 - e. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods* (EPA SW 846) (EPA, 1986)
 - f. *EPA Guidance for Data Quality Assessment: Practical Methods for Data Analysis* (EPA, 2000)
 - g. *EPA Requirements for Quality Assurance Project Plans* (EPA, 2001)
 - h. *EPA Guidance on Environmental Data Verification and Data Validation* (EPA, 2002)
- Other formatting, consistency, and editorial changes
- Addition of Sampling and Analysis Plan as an Appendix to the Closure Plan

WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: NA

Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class 11 modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit

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2015

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conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification
Approved/Concur:


Yes



Denied (state reason below)

Reason for denial:

Reviewed by Ecology:


S. Dahl

Date